

1 PAUL J. PASCUZZI, State Bar No. 148810
JASON E. RIOS, State Bar No. 190086
2 THOMAS R. PHINNEY, State Bar No. 159435
FELDERSTEIN FITZGERALD
3 WILLOUGHBY PASCUZZI & RIOS LLP
500 Capitol Mall, Suite 2250
4 Sacramento, CA 95814
Telephone: (916) 329-7400
5 Facsimile: (916) 329-7435
Email: ppascuzzi@ffwplaw.com
6 jrios@ffwplaw.com
7 tphinney@ffwplaw.com

8 ORI KATZ, State Bar No. 209561
ALAN H. MARTIN, State Bar No. 132301
9 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
A Limited Liability Partnership
Including Professional Corporations
10 Four Embarcadero Center, 17th Floor
San Francisco, California 94111-4109
11 Telephone: (415) 434-9100
Facsimile: (415) 434-3947
12 Email: okatz@sheppardmullin.com
13 amartin@sheppardmullin.com

14 Attorneys for The Roman Catholic Archbishop of
San Francisco

15 UNITED STATES BANKRUPTCY COURT
16 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION
17

18 In re
19 THE ROMAN CATHOLIC ARCHBISHOP
OF SAN FRANCISCO,

20 Debtor and
21 Debtor in Possession.

Case No. 23-30564

Chapter 11

**DEBTOR'S PRELIMINARY RESPONSE
TO MOTION FOR RELIEF FROM STAY
TO PROCEED WITH STATE COURT
LITIGATION**

23 Date: November 9, 2023

24 Time: 1:30 p.m.

Location: via Zoom

25 Judge: Hon. Denis Montali
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Case No. 23-30564

1 The Roman Catholic Archbishop of San Francisco (“Debtor”), hereby files its preliminary
2 response to the *Motion for Relief from Stay to Proceed with State Court Litigation* filed by Victoria
3 Castro [ECF 247] (“Motion”) as follows:

4 1. The Debtor is working with its special insurance counsel and special insurance
5 counsel for the Official Committee of Unsecured Creditors to confirm the insurance coverage issues
6 to determine the effect, if any, of the relief requested in the Motion.

7 2. Counsel for the Debtor has discussed the status of the insurance inquiry with counsel
8 for the moving party. The parties have agreed to continue the hearing on the Motion to the Court’s
9 next available hearing date in this case of November 30, 2023, at 1:30 p.m.

10 3. The parties will endeavor to have an agreed resolution of the Motion by that date.

11 Dated: November 8, 2023

FELDERSTEIN FITZGERALD WILLOUGHBY
PASCUZZI & RIOS LLP

13 By: /s/ Paul J. Pascuzzi
14 PAUL J. PASCUZZI
15 JASON E. RIOS
16 THOMAS R. PHINNEY

17 Attorneys for The Roman Catholic Archbishop of
18 San Francisco

19 Dated: November 8, 2023

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

21 By: /s/ Ori Katz
22 ORI KATZ
23 ALAN H. MARTIN

24 Attorneys for The Roman Catholic Archbishop of
25 San Francisco
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